MOTIVA
ENTERPRISES LLC

January 6, 2011

VIA UPS TWO DAY DELIVERY
UPS Tracking No. 1Z7700710795066189
Director, Air Protection Division
US EPA Region III
1650 Arch Street
Philadelphia, PA 19103

Re: 40 CFR 63 Subpart BBBBBB
Notification of Compliance Status and Operating Parameter Basis
Motiva Enterprises LLC Montvale Virginia Terminal

Dear Sir or Madam:

Please find enclosed the Notification of Compliance Status (NOCS) for the NESHAP: Gasoline Distribution Area Sources for the referenced Motiva Enterprises LLC Montvale Terminal, as required by 40 CFR 63.11093(b) and operating parameter basis required by 63.11092(b)(4) and (5)(ii) and 63.11094(f)(2).

Should you have any questions regarding this NOCS or operating parameter basis, please contact Tom Jackson, Environmental Coordinator at 703-323-0006 or thomas.jackson@motivaent.com.

Very truly yours,

MOTIVA ENTERPRISES LLC

Roger P. Leitch
Regional Manager

Enclosures: NOCS and Operating Parameter Basis

cc: **VIA UPS TWO DAY DELIVERY**
UPS Tracking No. 1Z7700710798362200
Mr. Frank Adams
Air Compliance and Monitoring Manager
Virginia Department of Environmental Quality
Blue Ridge Regional Office
3019 Peters Creek Road
Roanoke, VA 24019

Motiva Enterprises LLC
HSE
PO Box 2463
Houston, Texas 77252-2463

cc continued:
D.L. Jones
T.H. Jackson
File: 430-09 ENV.02-04

GACT Notification of Compliance Status

SECTION I: FACILITY INFORMATION

Operating Permit Number:

30228

Facility ID Number:

30228

Facility Name:

Motiva Enterprises LLC – Montvale Terminal

Facility Address:

Highway 460, Montvale, VA 24122

Responsible Official's Name/Title Or Duly Authorized Representative:

Roger P. Leitch, Regional Manager Phone No. 713/241-2491

Facility Local Contact Name/Title:

Danny Jones, Terminal Supervisor Phone No. 804/641-6824

Environmental Contact Name/Title:

Tom Jackson, Environmental Coordinator Phone No. 703/323-0006

SECTION II: SOURCE DESCRIPTION

Facility Description

The facility is a bulk gasoline terminal that is an area source of Hazardous Air Pollutants (HAPs). HAP emissions result from the movement of petroleum products into, within and out of the facility, storage of petroleum and other products and maintenance of aboveground storage tanks. The facility currently contains aboveground storage tanks in various types of service, including: gasoline, ethanol, fuel additives, distillate, and transmix. During loading of tank trucks, gasoline vapors are collected and processed through a vapor recovery unit (VRU).

Types of Emission Points

Emission points at this facility include gasoline storage tanks, gasoline loading racks and equipment components in vapor or liquid gasoline service.

SECTION III: NOCS REQUIRED INFORMATION [63.11093(b) and 63.9(h)(2)(i)]

(A) The methods that were used to determine compliance.

The methods for demonstrating continuous compliance described in Section IV of this NOCS have been put in place and were used to demonstrate compliance. The gasoline loading rack is being operated in compliance with an enforceable state or local air permit that requires that it meet a Total Organic Compounds (TOC) emission limit of 80 mg per liter of gasoline loaded or less. A statement by the responsible official or duly authorized representative is included with this NOCS certifying the compliance status of the gasoline loading rack in accordance with 63.11092(a)(2) in lieu of conducting the test otherwise required by 63.11092(a)(1).

(B) The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted.

No specific performance tests, visible emission observations, CMS evaluations or other monitoring procedures/methods were conducted or were required to demonstrate compliance prior to this NOCS. The methods for demonstrating continuous compliance described in Section IV of this NOCS have been put in place. The gasoline loading rack is being operated in compliance with an enforceable state or local air permit that requires that it meet a TOC emission limit of less than 80 mg per liter of gasoline loaded. A statement by the responsible official or duly authorized representative is included with this NOCS certifying the compliance status of the gasoline loading rack in accordance with 63.11092(a)(2) in lieu of the test otherwise required by 40 CFR 63.11092(a)(1). A performance test will be performed after January 10, 2011 in accordance with test procedures specified by 63.11092(a)(1)(i), 40 CFR 60.503 and 63.11092(b)(1)(i)(A) to demonstrate compliance with the loading rack emissions limit and associated monitoring requirements.

(C) The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods

See Section IV of this NOCS.

(D) The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard.

HAPs emitted include benzene, n-hexane, methyl tertiary-butyl ether, toluene, ethylbenzene, xylenes, isooctane, cumene, naphthalene, and styrene. The facility emits less than 10 tons per year of any single HAP and less than 25 tons per year of all HAPs combined. The facility is an area source of HAPs. The HAPs are a component of TOC emitted by the source. Estimates of HAP and TOC quantities are documented in air permit applications and/or emissions inventories submitted to EPA-authorized delegated state agencies.

(E) If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification).

The relevant standard only applies to area sources. The subject facility is an area source with emissions of less than 10 tons per year of any single HAP and less than 25 tons per year of all HAPs combined.

(F) A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method).

See Section IV of this NOCS. Equipment is designed to control TOC emissions.

(G) A statement by the owner or operator of the affected existing, new, or reconstructed source as to whether the source has complied with the relevant standard or other requirements.

The facility is in compliance with the relevant standard and other requirements as described in Section IV of this NOCS.

SECTION IV: COMPLIANCE METHODS AND AIR POLLUTION CONTROL EQUIPMENT

The facility will comply with all emission limits, management practices, testing, monitoring, record keeping, notification and reporting requirements using the methods and air pollution control equipment specified in 63.11087, 63.11088, 63.11089, 63.11092, 63.11093, 63.11094 and 63.11095. Specific compliance methods and equipment are described in the Section.

Gasoline Tanks [63.11087]

All gasoline tanks less than 75 cubic meters in capacity have a fixed roof and all openings are maintained in a closed position at all times when not in use. [63.11087(a)]

Gasoline tanks greater than or equal to 75 cubic meters in capacity will be in compliance with 63.11087(a) at the next tank degassing or prior to January 10, 2018, whichever is first. [63.11087(b)] An NOCS for each tank will be submitted in accordance with 40 CFR 63.9(h)(2)(ii).

Inspections will be conducted as required by 63.11092(e). Records will be kept and notifications or reports submitted as required by 63.11087, 63.11093, 63.11094(a), and 63.11095(a).

Gasoline Load Rack [63.11088]

The gasoline loading rack complies with the following emission limits and management practices [63.11088(a)]:
(a) Is equipped with a vapor collection system designed to collect the TOC vapors displaced from cargo tanks during product loading;
(b) Reduces emissions of TOC to less than or equal to 80 mg/l of gasoline loaded into gasoline cargo tanks at the loading rack through use of a carbon adsorption system (VRU);
(c) Has a vapor collection system designed and operated to prevent any TOC vapors collected at one loading rack from passing to another loading rack; and
(d) Loading of gasoline is limited to gasoline cargo tanks that are vapor tight using the procedures specified in § 60.502(e) through (j).

The control efficiency of the VRU is approximately 95% or greater.

Records will be kept and notifications or reports will be submitted as required by 63.11088, 63.11092(f), 63.11093, 63.11094(b), and 63.11095(a) and (b).

The VRU is equipped with a Continuous Monitoring System (CMS) that consists of a continuous emissions monitoring system (CEMS). The CEMS was installed, calibrated, and certified according to the manufacturer's specifications and is operated and maintained according to the manufacturer's specifications. [63.11092(b)] The CEMS monitors an operating parameter value based on engineering assessment and the manufacturer's recommendations. [63.11092(b)(5)(ii)]

This facility is operating the gasoline loading rack pursuant to a current State enforceable permit that requires the loading rack to meet a TOC emission limit of 80 mg/L or less and is hereby certifying the compliance status of the loading rack in lieu of the test otherwise required by 63.11092(a)(1). [40 *CFR* 63.11092(a)(2)] Information about the air permit and emission limit requirement follows:

Permit no.: 30228
Issuing agency: Virginia Department of Environmental Quality
Date of issuance: January 29, 2009
Condition no.: 3
Condition specifying emission limit:

"Volatile organic compound (VOCs) emissions from the loading of gasoline at the truck loading rack shall be controlled by an activated carbon adsorption vapor recovery unit (VRU). The emissions to the atmosphere from the VRU shall not exceed 35 milligrams of VOC per liter of gasoline loaded..."

After January 10, 2011, a performance test will be conducted following the test requirements specified in 63.11092(b)(1)(i) and 40 CFR 60.503. For the performance test of the VRU, the CEMS will be used to monitor operation of the system in accordance with 63.11092(b)(1)(i)(A). The operating parameter value will be determined in accordance with 63.11092(b)(5)(ii).

Records will be kept and notifications or reports will be submitted as required by 63.11088, 63.11092, 63.11093, 63.11094(f), and 63.11095(b).

Gasoline Equipment Leak Inspection [63.11089]

The facility has implemented a monthly equipment leak inspection program pursuant to 63.11089.

Records will be kept and notifications or reports submitted as required by 63.11089, 63.11093, 63.11094(d) and (e), and 63.11095(a) and (b).

SECTION V: CERTIFICATION STATEMENT OF RESPONSIBLE OFFICIAL OR DULY AUTHORIZED REPRESENTATIVE [40 CFR 63.9(h)(2)(i)]

Based on information and belief formed after reasonable inquiry, the statements made in this Notification of Compliance Status are true, accurate and complete to the best of my knowledge.

Roger P. Leitch Print Name	Regional Manager Title
 Signature	1-6-11 Date

Operating Parameter Value and Basis
for the Vapor Recovery Unit
Continuous Emissions Monitoring System (CEMS)
Motiva Enterprises LLC Montvale Terminal

The Terminal operates the gasoline loading rack and Vapor Recovery Unit (VRU) in compliance with an enforceable state or local permit that requires the loading rack to meet an emission limit less than 80 mg of Total Organic Compounds (TOC) per liter of gasoline loaded ("80 mg/l"). The Terminal has therefore submitted with the Notification of Compliance Status a statement by the responsible official in accordance with 63.11092(a)(2) certifying the compliance status of the gasoline loading rack in lieu of the test otherwise required by 63.11092(a)(1). At a performance test performed after January 10, 2011 in accordance with test procedures specified by 63.11092(a)(1)(i) and 40 CFR 60.503, a monitored operating parameter value will be determined as required by 63.11092(b)(3). In accordance with 63.11092(b)(4) and (5)(ii) and 63.11094(f)(2), the following provides for the Administrator's approval the rationale for the selected operating parameter value based on an engineering assessment and the manufacturer's recommendations, until the time the performance test is conducted.

The Terminal is equipped with a CEMS that serves as the monitoring system to verify compliance with the 80 mg/l emission limit while gasoline vapors are displaced from truck loading to the VRU. The CEMS measures TOC concentration in the exhaust air stream of the VRU vent but does not simultaneously measure the amount of gasoline loaded. Readings from the CEMS are therefore considered operating parameter values and not direct measurements of emissions in terms of the mg TOC per liter gasoline loaded emission limit.

Operating Parameter Value and Averaging Time

For the emission limit of 80 mg/l required by 63.11088(a) the proposed operating parameter value and averaging time are:

> *No greater than 8.4 % TOC by volume (as propane) in the VRU outlet stream monitored continuously by a CEMS and averaged over a six-hour rolling period. For excess emissions reporting purposes under 40 CFR 63.11095(b)(3), measurement of 5% over a six-hour rolling average with the existing CEMS will be considered a potential exceedance of the 80 mg/l emission limit instead of 8.4%, for the reason provided in the Basis section of this document.*

Basis

The VRU manufacturer (John Zink Company) recommends maximum TOC vent concentrations of 1.1% and 3.7% maximum operating values for emission limits of 10 mg/l and 35 mg/l, respectively. The proposed 8.4% TOC value is based on a proportional extrapolation of the % TOC value equivalent to 35 mg/l to the value equivalent to 80 mg/l: (3.7%)(80 mg/l)/(35 mg/l) = 8.4%.

The effective span range of the Terminal's existing CEMS, however, is 0 – 5% to allow accurate monitoring of compliance with an air permit emission limit much lower than 80 mg/l. The CEMS is therefore unable to accurately measure values higher than 5% TOC. For excess emissions reporting purposes under 63.11095(b)(3), the Terminal will, therefore, as a conservative measure, report monitored emissions of 5% TOC (the upper limit of the CEMs equipment) averaged over six hours as a potential exceedance of the 80 mg/l (8.4% TOC) emission limit,

unless and until the CEMS is replaced with one that can accurately measure emissions at the 80 mg/l limit. The VRU CEMS is programmed to shut down the gasoline loading rack before the measured emissions exceed the air permit limit (35 mg/l), which provides assurance that the 80 mg/l emission limit will not be exceeded and the upper range of the CEMS will not be reached.

The six-hour averaging time is consistent with the averaging time of the six-hour minimum emissions performance test specified in 63.11092(a)(3) and 40 CFR 60.503 and the VRU manufacturer's recommendations.